

**DECLARATION OF STEPHANIE M. HATZIKYRIAKOU IN SUPPORT OF
PLAINTIFF’S MOTION TO PRECLUDE CERTAIN OPINIONS OF GE’S DAMAGES
EXPERT, CHRISTINE S. MEYER**

I, Stephanie M. Hatzikyriakou, declare as follows:

1. I am an attorney at the law firm of Baker and Hostetler LLP, counsel for Plaintiff Siemens Gamesa Renewable Energy A/S (“SGRE” or “Plaintiff”) in the above-captioned matter. I am licensed to practice law in Pennsylvania and New Jersey and am admitted *pro hac vice* in this matter (Dkt. 61).

2. I make this declaration in support of Plaintiff’s Motion to Preclude Certain Opinions of GE’s Damages Expert, Christine S. Meyer. I am familiar with the facts set forth herein.

3. Attached hereto as Exhibit A is a true and correct copy of excerpts of the rebuttal expert report of Christine S. Meyer, dated November 30, 2021. Defendant GE designated this document “HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY” under the Protective Order (Dkt. 71) in this matter.

4. Attached hereto as Exhibit B is a true and correct copy of excerpts of the deposition transcript of Vincent Schellings, dated October 6, 2021. Defendant GE designated this document “HIGHLY CONFIDENTIAL– ATTORNEY’S EYES ONLY” under the Protective Order (Dkt. 71) in this matter.

5. Attached hereto as Exhibit C is a true and correct copy of a document produced by GE bearing the Bates number GE_SGRE_000113144. Defendant GE designated this document “HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY” under the Protective Order (Dkt. 71) in this matter.

6. Attached hereto as Exhibit D is a true and correct copy of excerpts of the rough deposition transcript of Christine S. Meyer, dated December 10, 2021. Defendant GE designated

this document “HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY” under the Protective Order (Dkt. 71) in this matter.

7. Attached hereto as Exhibit E is a true and correct copy of excerpts of the Amended Expert Report of Kimberly J. Schenk, dated November 22, 2021. Plaintiff SGRE designated this document “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the Protective Order (Dkt. 71) in this matter.

8. Attached hereto as Exhibit F is a true and correct copy of excerpts of GE’s Third Supplemental Responses and Objections to SGRE’s Interrogatories (Nos. 1-25), dated October 27, 2021. Defendant GE designated this document “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the Protective Order (Dkt. 71) in this matter.

9. Attached hereto as Exhibit G is a true and correct copy of excerpts of the deposition transcript of John T. Olesen, dated September 16, 2021. Defendant GE designated this document “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the Protective Order (Dkt. 71) in this matter.

10. Attached hereto as Exhibit H is a true and correct copy of a document marked as Claramunt Deposition Exhibit 15. Defendant GE designated this document “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the Protective Order (Dkt. 71) in this matter.

11. Attached hereto as Exhibit I is a true and correct copy of a document produced by GE bearing the Bates number GE_SGRE_000271410. Defendant GE designated this document “HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY” under the Protective Order (Dkt. 71) in this matter.

12. Attached hereto as Exhibit J is a true and correct copy of the native document produced by GE bearing the Bates number GE_SGRE_000271410. Defendant GE designated this document “HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY” under the Protective Order (Dkt. 71) in this matter.

13. Attached hereto as Exhibit K is a true and correct copy of excerpts of the deposition transcript of Santiago Claramunt, dated September 22, 2021. Defendant GE designated this document “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the Protective Order (Dkt. 71) in this matter.

14. Attached hereto as Exhibit L is a true and correct copy of excerpts of the Rebuttal Expert Report of Alexander H. Slocum, dated November 30, 2021. Defendant GE designated this document “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the Protective Order (Dkt. 71) in this matter.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 16th day of December, 2021.

/s/ Stephanie M. Hatzikyriakou
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document filed through the ECF system will be sent electronically to the registered participants as identified in the Notice of Electronic Filing (NEF) this 16th day of December, 2021. I further certify that unredacted copies of exhibits to this document will be served on counsel of record via electronic mail on this 16th day of December, 2021.

/s/ Cory C. Bell
Cory C. Bell